

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

NELSON GLOBAL PRODUCTS, INC.,

Plaintiffs,

v.

LINCOLN INDUSTRIES,

Defendants.

Case No. 8:20-cv-338

**JOINT MOTION AND STIPULATION
TO EXTEND CASE PROGRESSION
DEADLINES**

COME NOW Plaintiff Nelson Global Products, Inc., and Defendant Lincoln Industries and stipulate to a thirty-day extension of all deadlines in the Amended Final Progression Order in this case. [Doc. No. 72.] The parties jointly move the Court to enter an Order amending the final progression order as follows:

1. To continue the status conference to discuss case progression, the parties' interest in settlement, and the trial and pretrial conference from August 25, 2022, to a date determined by the Court.
2. To extend the deadline for completing written discovery under Rules 33, 34, 36, and 45 of the Federal Rules of Civil Procedure from April 29, 2022, to May 31, 2022.
3. To extend the deadline for motions to compel written discovery under Rules 33, 34, 36, and 45 from May 13, 2022, to June 13, 2022.
4. To extend the deadline for identifying expert witnesses expected to testify at trial from January 14, 2022, to February 14, 2022.

5. To extend the deadline for complete expert disclosures for all experts expected to testify at trial from May 27, 2022, to June 27, 2022, with the deadline for rebuttal reports extended from July 15, 2022, to August 15, 2022.

6. To extend the fact deposition deadline, including but not limited to depositions for oral testimony only under Rule 45, from April 29, 2022, to May 31, 2022.

7. To extend the expert deposition deadline from August 22, 2022, to September 21, 2022.

8. To extend the deadline for filing motions to dismiss and motions for summary judgment from September 26, 2022, to October 26, 2022.

9. To extend the deadline for filing motions to exclude testimony on *Daubert* and related grounds from September 12, 2022, to October 12, 2022.

WHEREFORE, the parties respectfully request the Court enter an Order extending all deadlines set forth in the Amended Final Progression Order by thirty days as stipulated above.

DATED this 19th day of January, 2022.

NELSON GLOBAL PRODUCTS, INC., LINCOLN INDUSTRIES, Defendant
Plaintiff

By: s/ Paul M. Shotkoski
Paul M. Shotkoski, #20873
Patrick S. Cooper, #22399
Daniel J. Gutman, #26039
Fraser Stryker PC LLO
500 Energy Plaza
409 South 17th Street
Omaha, NE 68102
Telephone: (402) 341-6000
Fax: (402) 341-8290
Email: pshotkoski@fraserstryker.com

By: s/ Andre R. Barry
Andre R. Barry, #22505
Richard P. Jeffries, #20089
Nathan D. Clark, #25857
Cline Williams Wright
Johnson & Oldfather, L.L.P.
Sterling Ridge
12910 Pierce Street, Suite 200
Omaha, NE 68144
Telephone: (402) 397-1700
Fax: (402) 397-1806
Email: abarry@clinewilliams.com
rickjeffries@clinewilliams.com

and

and

J. Mark Wilson, *pro hac vice*
Chandra Duncan, *pro hac vice*
Moore & Van Allen PLLC
Bank of America Corporate Center
100 North Tryon Street, Suite 4700
Charlotte, NC 28202
Telephone: (704) 331-1000
Fax: (704) 331-1159
Email: markwilson@mvalaw.com
chandraduncan@mvalaw.com

Patrick Kuehl, Jr., MO #52370
Rimon Law
601 East 63rd Street, Suite
400 Kansas City, MO
64100 Telephone: (816) 839-4639
Fax: (816) 839-4639
Email: Patrick.kuehl@rimonlaw.com

and

David Stein, *pro hac vice*
Brown Rudnick
2211 Michelson Drive, 7th Floor
Irvine, CA 92612
Telephone: (949) 440-0231
Fax: (949) 486-3686
Email: dstein@brownrudnick.com

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2022, the foregoing was filed using the Court's CM/ECF system, which will automatically provide notice to all attorneys of record.

By: s/ Andre R. Barry
Andre R. Barry